

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>IN RE:</b>	<b>:</b>	<b>CHAPTER 13</b>
<b>LATEICE RENEE BUMPERS</b>	<b>:</b>	<b>CASE NUMBER A11-75133-WLH</b>
	<b>:</b>	
<b>DEBTOR</b>	<b>:</b>	<b>JUDGE HAGENAU</b>

**CHAPTER 13 TRUSTEE'S OBJECTION TO  
CONFIRMATION AND MOTION TO DISMISS CASE**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Debtor's payments under the proposed plan are not current, thus indicating that this plan is not feasible. 11 U.S.C. 1325(a)(6).

2.

The plan as proposed will extend beyond sixty (60) months, contrary to 11 U.S.C. Section 1322(d). (63 months).

3.

The Chapter 13 Trustee requests proof of the post petition mortgage payments in order to determine feasibility of proposed plan pursuant to 11 U.S.C. 1325(a)(6).

4.

The Debtor proposes to retain real property with pre-petition arrearage of \$14,000.00 and negative equity of \$99,298.00, while paying unsecured creditors a zero percent (0%) dividend which may violate 11 U.S.C. Section 1325 (a)(3).

5.

Due to a change in circumstances since filing, Schedules I and J do not correctly reflect the current financial situation, thereby preventing the Trustee from evaluating feasibility. 11 U.S.C. Section 1325(a)(6). (new employment).

6.

The Trustee requests proof of income in order to determine the accuracy and veracity of the plan and/or Schedules. 11 U.S.C. 521(1), 1325(a)(3), 1325(b)(1)(B).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

Respectfully submitted,

/s/

Maria J. Kirtland, Attorney for Chapter 13 Trustee  
GA Bar No. 118350

/nt

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served:

Debtor:

Lateice Renee Bumpers  
1823 Springhill Cove  
Lithonia, GA 30058

Attorney for Debtor:

King & King, P.C.  
215 Pryor Street, SW  
Atlanta, GA 30303-3748

with a copy of the foregoing Trustee's Objection by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

THIS THE 19<sup>th</sup> day of October, 2011

/s/

Maria J. Kirtland, Attorney for Chapter 13 Trustee  
GA Bar No. 118350  
303 Peachtree Center Ave., NE  
Ste 120  
Atlanta, GA 30303  
(678) 992-1201